



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

July 15, 2010

Mr. Stephen Bland
Chief Executive Officer
Port Authority of Allegheny County
345 Sixth Avenue, 3rd Floor
Pittsburgh, PA 15222-2527

Re: Pennsylvania High-Speed Maglev Project, Pittsburgh International Airport to the Greensburg area, Allegheny and Westmorland Counties, Final Environmental Impact Statement/ Section 4 9f) Evaluation, June 2010; CEQ #20100213

Dear Mr. Bland:

The U.S. Environmental Protection Agency, Region III (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the subject document. This review was conducted in accordance with Section 309 of the Clean Air Act, as amended (42 U.S.C. 7609, PL 91-604 12(a), 84 Stat.1709), and the National Environmental Policy Act (NEPA). In a December 6, 2005 letter, EPA rated the impacts of the action as "Environmental Concerns" and the adequacy of the impact statement as "Insufficient Information". While the FEIS addressed most of EPA's comments on the Draft EIS, there remain a few environmental concerns and issues that have not been addressed.

The proposed action consists of constructing an operating Maglev system between Pittsburgh International Airport (PIA), the City of Pittsburgh, the Monroeville/Penn Hills area, and the Greensburg/ Hempfield Township area. The proposed project is approximately 54 miles in length, with an additional 3 miles to accommodate guideway access to the visitor/ maintenance facility near PIA. The proposed action also includes the construction of five passenger stations at the following locations: PIA, Enlow Road, Steel Plaza, Thompson Run, and Toll 66/ Route 136. Also included are associated roadway improvements to provide or improve access to the stations. The major roadway improvements include construction of new interchanges at: Enlow Road and PA Route 60; I-376 and Thompson Run; and improvements to the Toll 66 and PA Route 136 interchange.

According to the FEIS, the Preferred Alternative, identified as the Environmentally Preferred Build Alternative in the DEIS with modifications, is the alternative that best meets the project Purpose and Need, balances the benefits and impacts of the project. The Preferred Alternative, with "worst case" assumptions could potentially impact 16,376 linear feet of perennial stream, 2,996 linear feet of intermittent stream, 619.3 acres of forest, 125.5 acres of



rangeland, 36.2 acres of agricultural land, and 5.8 acres of wetlands. The FEIS states on page 4-8 that most surface water, including streams could be spanned because the guideway is elevated.

The FEIS states that the excavated waste from the Preferred Alternative will be approximately 22,598,915 cubic yards but this number can be reduced to 15,678,915 cubic yards. Further reduction measures should be investigated and any borrow or waste areas should not impact environmental resources.

Every effort should be made to avoid and minimize impacts caused by this project. This includes spanning wetlands and other surface water bodies. The appropriate state and federal agencies should be contacted annually regarding threatened, endangered, and other species of concern. The coordination documented in the FEIS is from 2006 and 2007. The project team should work with EPA and other agencies to develop an acceptable mitigation plan for unavoidable impacts.

Consideration of PM2.5 emissions from mobile sources and any impacts resulting from implementation of the Maglev project on the emissions should be included, as the region is in nonattainment for both the annual and daily PM2.5 standards.

The project team should continue to work with the community to avoid and minimize impacts caused by the project. It appears that a significant proportion of the impacted census tracts in the B4 – West Alignment (67%) are of Environmental Justice concern; and that 38.9% and 33.3% of the census tracts in the A5 – South and C6 Alignments, respectively, are impacted by the project. In looking at the proportion of census tracts impacted, in relation to the size of the at-risk populations, it is recommended that additional steps be taken to assure that minority and low-income populations are not disproportionately and/or adversely impacted by the project. Efforts should be taken to assure close and clear communication and interaction with the communities in question to identify and secure opportunities for those communities to reap benefits from the activities taking place in their communities. Plans to engage communities needs to be developed with input from the at-risk populations; feedback and meaningful input is required to assure that activities do not have disproportionate or adverse impacts, that appropriate mitigation of impacts occurs, and that these communities are fully integrated into any and all initiatives that will bring about environmental, economic or cultural benefits to the communities of concern.

The FEIS states that the project's capital cost and financing uses a 2003 base cost that is inflated to a year of expenditure cost and that this cost, along with an updated financing plan will be updated prior to the Record of Decision. It also states that assuming Section A becomes operational in 2013, Section B in 2014, and Section C in 2015, the cost is estimated at \$5.325 billion. However, no funding for construction has been secured so the estimate may change. The cost estimates should be updated using the most current and accurate information. The FEIS also states that based on modeling, the weekday ridership demand estimates are lower than the demand estimates presented in the DEIS due to the redistribution of population and employment growth. Given the uncertainty with the funding for the project, the schedule the ridership and traffic estimates should be closely monitored. Modifications to the project should be considered if estimates continue to change.



Thank you for the opportunity to offer these comments. If you have any questions please contact Ms. Barbara Okorn at (215)814-3330.

Sincerely,

A handwritten signature in black ink, appearing to read 'Barbara Rudnick', with a stylized flourish at the end.

Barbara Rudnick
NEPA Team Leader



